

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

MARY LODGE,

Plaintiff,

v.

UNITED HOMES, LLC, UNITED PROPERTY
GROUP, LLC, YARON HERSHCO, GALIT
NETWORK, LLC, OLYMPIA MORTGAGE
CORP., BAYVIEW LOAN SERVICING, LLC,
BAYVIEW ASSET MANAGEMENT, LLC,
U.S. BANK, N.A., AS TRUSTEE FOR BAYVIEW
ASSET-BACKED SECURITIES TRUST SERIES
2007-30, and BAYVIEW FINANCIAL
MANAGEMENT CORP.

Defendants.

Civil Action No.: CV-05-0187
(KAM)(RLM)

DECLARATION OF RACHEL GEBALLE

I, Rachel Geballe, co-counsel for the plaintiffs, hereby declare under penalty of perjury that the following is true and accurate description of my experience and account of the hours and costs incurred in litigating the above-captioned case:

1. I became a member of the bar of the State of New York in 2007. I have been a practicing attorney from 2007 to the present.
2. I am admitted to practice before the United States District Court for the Eastern District of New York.
3. I am employed as a staff attorney with South Brooklyn Legal Services where I specialize in litigation involving violations of state and federal laws governing mortgage lending.
4. I have been involved in the litigation of the six consolidated cases against United Homes and other defendants since June of 2009.

5. Attached is an accurate and contemporaneously created account of hours spent by attorneys at South Brooklyn Legal Services, including myself, pursuing discovery related to the ownership of the Lodge mortgage, responding to the motions to dismiss and for summary judgment on the holder in due course defense, and in assisting the plaintiff's Motion to Strike the Holder in Due Course Defense. South Brooklyn Legal Services has segregated these hours out from our daily time log on the United Homes cases in order to provide the Bayview Defendants and the Court with the total time spent on the activities for which the Court found sanctions were awardable.

Dated: June 15, 2011
Brooklyn, New York



Rachel Geballe, Of Counsel
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